

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

FARMERS TELECOMMUNICATIONS COOPERATIVE, INC.,	*
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Plaintiff,	
v.	* CIVIL CASE NO. 2:06cv-790-WC
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VERIZON BUSINESS NETWORK SERVICES INC. and QWEST COMMUNICATIONS CORPORATION	
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Defendants.	*

**JOINT MOTION TO EXTEND TIME
FOR FILING RULE 26(a)(1) DISCLOSURES**

Plaintiff/Counter-Defendant Farmers Telecommunications Cooperative, Inc.;
Defendant/Cross-Defendant Qwest Communications Corporation; and
Defendant/Counter-Claimant/Cross-Claimant Verizon Business Network Services Inc.,
respectfully and jointly move the Court to extend the deadline for filing initial
disclosures, as required by FED. R. CIV. P. 26(a)(1), for a period of thirty (30) days while
the parties pursue ongoing settlement discussions. As grounds for so moving, the parties
represent to the Court as follows:

1. This case involves complicated accounting and regulatory issues that the parties wish to resolve, if possible, by agreement.
2. The parties' representatives have been engaged in ongoing settlement discussions that, while productive in many significant respects, have not yet culminated

in a resolution of their disputes. The parties are optimistic that their disputes may be resolved with additional time.

3. In an effort to assist the parties, the Court convened a status hearing on February 12, 2007. During the hearing, the Court set a deadline of February 28, 2007, for Defendants to answer the Complaint. [Doc. 26]

4. The Court, having been apprised of the parties' ongoing settlement discussions, indicated a willingness to stay the case for a period of thirty (30) days thereafter to allow the parties to continue their efforts to voluntarily resolve their disputes. [Doc. 26] The Court indicated that if a settlement was not reached, the dates in the Proposed Discovery Plan [Doc. 15], submitted by the parties on January 12, 2007, would be kept with the exception of a thirty (30) day extension for discovery and a new date for trial. [Doc. 26] The Court offered its assistance with settlement issues, if needed. [Doc. 26]

5. Verizon Business and Qwest answered the Complaint on or before February 28, 2007, as directed by the Court.

6. The Proposed Discovery Plan originally established a February 15, 2007 deadline for filing initial disclosures. [Doc. 15] The February 15, 2007 deadline was subsequently modified by the Court's January 29, 2007 Order granting Qwest's Unopposed Motion for Extension of Time to File Answer and Extend the Deadlines set forth in the Proposed Discovery Plan. [Doc. # 17]. The Order effectively extended the deadline for filing initial disclosures to March 17, 2007.

7. The parties are uncertain of their responsibilities regarding the exchange of initial disclosures. Specifically, the parties are uncertain whether the 30-day stay referenced in the Minute Entry from the February 12, 2007 hearing extends the deadline for filing initial disclosures to and including April 16, 2007.

8. The parties respectfully and jointly request that the Court enter an Order allowing the parties to exchange initial disclosures on or before April 16, 2007. The parties request this relief in an effort to conserve resources and avoid added expense while productive settlement negotiations remain ongoing.

9. The parties represent to the Court that they would not request this extension if they believed that settlement was not possible or likely, and that by requesting the extension, the parties do not mean to unnecessarily delay the proceeding.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully and jointly request that the Court enter an Order allowing the parties to exchange initial disclosures on or before April 16, 2007.

Dated: March 16, 2007

/s/ Jonathan M. Hooks

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CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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